Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)
Performance Measurements and Standards for Unbundled Network Elements and Interconnection)) CC Docket No. 01-318)
Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance)) CC Docket No. 98-56)
Deployment of Wireline Services Offering Advanced Telecommunications Capability) CC Docket No. 98-147
Petition of Association for Local Telecommunications Services for Declaratory Ruling)) CC Docket Nos. 98-147, 96-98, 98-141)

MOTION TO ACCEPT PLEADING AS TIMELY FILED

BellSouth Corporation, on behalf of itself and its wholly owned subsidiaries ("BellSouth"), hereby requests that, for good cause shown, the Commission accept its Reply Comments in the above-captioned proceeding as timely filed.

BellSouth was prevented from filing its Reply Comments electronically on February 12, 2002, due to the unavailability of the Commission's Electronic Comment Filing System ("ECFS"). Upon contacting the ECFS helpline by telephone on the evening of February 12, BellSouth was advised by a recorded message that the ECFS would be unavailable until noon today, February 13, 2002, due to unscheduled maintenance on the Commission's servers. BellSouth subsequently filed its Reply Comments via the ECFS today.

Accordingly, because BellSouth was prevented from electronically filing its Reply Comments prior to the filing deadline because of the unavailability of the ECFS, BellSouth requests that the Commission accept its Reply Comments, filed today, February 13, 2002, as timely filed.

Respectfully submitted,

BELLSOUTH CORPORATION

By:

Richard M. Sbaratta

J. Phillip Carver

Its Attorneys

Suite 4300

675 W. Peachtree Street, N.E. Atlanta, Georgia 30375-0001

(404) 335-0710

Dated: February 13, 2002

CERTIFICATE OF SERVICE

I do hereby certify that I have this 13th day of February 2002 served the following parties to this action with a copy of the foregoing MOTION TO ACCEPT PLEADING AS TIMELY FILED by electronic filing and/or by placing a copy of the same in the United States Mail, addressed to the parties listed on the attached service list.

Luanita H. Lee

SERVICE LIST CC DOCKET NOS. 01-318, 98-56, 98-147, 96-98, 98-141

James Bradford Ramsay NARUC General Counsel National Association of Regulatory Utility Commissioners 1101 Vermont Avenue, Suite 200 Washington, DC 20005 Gregg C. Sayre Associate General Counsel Frontier Communications Citizens Communications 180 South Clinton Avenue Rochester, New York 14646

Russell I. Zuckerman Francis D. R. Coleman Richard E. Heatter Marilyn H. Ash Mpower Communications Corp. 175 Sully's Trail Suite 300 Pittsford, NY 14534

Susan J. Bahr Small Independent Telephone Companies Law Offices of Susan Bahr, PC P. O. Box 86089 Montgomery Village, MD 20886-6089

Lawrence G. Malone
Brian Ossias
Public Service Commission
Of The State of New York
Three Empire State Plaza
Albany, New York 12223-1352

Rose Mulvany Henry Birch Telecom, Inc. 2020 Baltimore Avenue Kansas City, MO 64108 Ken Reif, Director Colorado Office of Consumer Counsel 1580 Logan Street, #740 Denver, CO 80203 William Irby
Director, Division of Communications
Virginia State Corporation
Commission Staff
Box 1197
Richmond, VA 23218

Brad E. Mutschelknaus Jonathan E. Canis Steven A. Augustino Genevieve Morelli Andrew M. Klein Kelley Drye & Warren LLP 1200 19th Street, N.W. Washington, D.C. 20036

Dana K. Joyce Marc D. Poston Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Richard R. Cameron Karen Brinkmann Elizabeth R. Park Latham & Watkins 555 Eleventh Street, N.W., Suite 1000 Washington, D.C. 20004-1304

Richard J. Metzger Focal Communications Corporation 7799 Leesburg Pike Suite 850 North Falls Church, VA 22043 John Sumpter Pac-West Telecomm, Inc. 1776 March Lane Suite 250 Stockton, CA 95207 Wanda Montano US LEC Corp. Three Morrocroft Centre 6801 Morrison Blvd. Charlotte, NC 28211

Richard M. Rindler
Patrick J. Donovan
Michael W. Fleming
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Teresa K. Gaugler Jonathan Askin Association for Local Telecommunications Services 888 17th Street, NW Washington, D.C. 20005

Juanita Harris
Christopher Heimann
Gary L. Phillips
Paul K. Mancini
SBC Communications, Inc.
1401 I Street, N.W., 11th Floor
Washington, D.C. 20005

James S. Blitz R. Dale Dixon, Jr. XO Communications, Inc. Davis Wright Tremaine LLP 1500 K Street N.W., Suite 450 Washington, D.C. 20005 R. Gerard Salemme
Nancy Krabill
Alaine Miller
XO Communications, Inc.
Suite 1000
1730 Rhode Island Avenue, N.W.
Washington, D.C. 20036

William A. Haas
Deputy General Counsel
McLeodUSA Telecommunications
Services, Inc.
6400 C Street SW
Cedar Rapids, Iowa 52406

Dan Lipschultz
Assistant General Counsel
McLeodUSA Telecommunications
Services, Inc.
Highway 169, Suite 750
Minneapolis, Minnesota 55426

Jason D. Oxman Assistant General Counsel Covad Communications Company 600 14th Street, N.W., Suite 750 Washington, D.C. 20554

Andrew D. Lipman
Patrick J. Donovan
Tamar E. Finnn
Business Telecom, Inc., Cavalier Telephone, LLC,
DSLnet Communications, L.L.C., Network
Telephone Co., and RCN Telecom Services, Inc.
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Scott Sawyer Vice President-Regulatory Affairs Conversent Communications, LLC 222 Richmond Street Suite 301 Providence, RI 02903 James L. Casserly
Robin E. Tuttle
Angela F. Collins
AT&T Corp.
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Kevin M. Joseph Mary C. Albert Allegiance Telecom, Inc. Suite 420 1919 M Street N.W. Washington, D.C. 20036

Raymond L. Gifford
Polly Page
Jim Dyer
The Public Utilities Commission of the
State of Colorado
1580 Logan Street, Office Level 2
Denver, CO 80203

Mark C. Rosenblum Lawrence J. Lafaro Richard H. Rubin Teresa Marrero AT&T Corp. Room 1134L2 295 North Maple Avenue Basking Ridge, NJ 07920

Thomas Jones Christi Shewman Kelly N. McCollian Allegiance Telecom, Inc. Willkie Farr & Gallagher Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20036

Betty Montgomery Steven T. Nourse Public Utilities Section Public Utilities Commission of Ohio 180 East Broad Street, 9th Floor Columbus, Ohio 43215-3793 David W. Zesiger
The Independent Telephone &
Telecommunications Alliance
1300 Connecticut Avenue, N.W.
Suite 600
Washington, D.C. 20036

Michael G. Hoffman Patricia Zacharie VarTec Telecom, Inc. 1600 Viceroy Drive Dallas, Texas 75235

John Glicksman
Terry Romine
Adelphia Business Solutions, Inc.
One North Main Street
Coudersport, PA 16915

Douglas E. Hart Cincinnati Bell Telephone Company Frost Brown Todd LLC 2200 PNC Center 201 East Fifth Street Cincinnati, Ohio 45202

Robert B. McKenna Sharon J. Devine Qwest Communications International, Inc. Suite 700 1020 19th Street, N.W. Washington, D.C. 20036

Gary M. Cohen
Lionel B. Wilson
Ellen S. Levine
People of the State of California and the
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Richard M. Rindler
Ronald W. Del Sesto
TDS Metrocom, Inc., USLink, Inc., and
Madison River Communications
Swidler Berlin Shereff Friedman
3000 K Street, NW, Suite 300
Washington, D.C. 20007

Carol Ann Bischoff
Jonathan Lee
Competitive Telecommunications
Association
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

Robert J. Aamoth Joan M. Griffin Competitive Telecommunications Association Kelley Drye & Warren, LLP Suite 500 1200 19th Street, N.W. Washington, D.C. 20036 Michael E. Glover Karen Zacharia Leslie V. Owsley Verizon Telephone Companies Suite 500 1515 North Courthouse Road Arlington, VA 22201-2909

Mark L. Evans Scott H. Angstreich Verizon Telephone Companies Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C. Sumner Square 1615 M Street, N.W., Suite 400 Washington, D.C. 20036

Joyce E. Davidson
Public Utility Division
Oklahoma Corporation Commission
P. O. Box 52000
Oklahoma City, Oklahoma 73152-2000

Jay C. Keithley Richard Juhnke Sprint Corporation 401 9th Street, N.W., #400 Washington, D.C. 20004

Craig T. Smith Sprint Corporation 7301 College Blvd. Overland Park, KS 66210

Charles McKee Sprint Corporation 6160 Sprint Parkway Overland Park, KS 66251 Brett A. Periman Rebecca Klein Public Utility Commission of Texas 1701 N. Congress Avenue Austin, Texas 78711-3326

Howard J. Symons
Michael Pryor
Christopher R. Bjornson
AT&T Wireless Services, Inc.
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Douglas I. Brandon AT&T Wireless Services, Inc. 1150 Connecticut Avenue, N.W. Suite 400 Washington, D.C. 20036 L. Marie Guillory
Daniel Mitchell
National Telephone Cooperative Association
4121 Wilson Boulevard, 10th Floor
Arlington, VA 22203

Richard A. Askoff National Exchange Carrier Association, Inc 80 South Jefferson Road Whippany, New Jersey 07981

Margot Smiley Humphrey National Rural Telecom Association Holland & Knight 2099 Pennsylvania Avenue, Suite 100 Washington, D.C. 20006 Stuart Polikoff
Organization for the Promotion and
Advancement of Small
Telecommunications Companies
21 Dupont Circle, NW, Suite 700
Washington, D.C. 20036

Kimberly Scardino Lisa Youngers Karen Reidy Lori Wright WorldCom, Inc. 1133 19th Street, NW Washington, D.C. 20036

J. G. Harrington Cox Communications, Inc. Dow, Lohnes & Albertson, PLLC Suite 800 1200 New Hampshire Avenue, N.W. Washington, D.C. 20036 George N. Barclay Michael J. Ettner General Services Administration 1800 F Street, N.W., Room 4002 Washington, D.C. 20405

Qualex International The Portals, 445 12th Street, S.W. Room CY-B402 Washington, D.C. 20554 Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Room 5-B540
Washington, D.C. 20554